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May 2, 2022  
By ECF  
Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street, Suite 1610  
New York, NY 10007-1312

Re: United States v. Rubin Ramirez,  
19 Cr 579(VM)

Your Honor,

As the Court is aware Mr. Ramirez is currently out on bail under the following conditions: \$175,000 PRB, secured by 3 co-signers plus all standard conditions. He also wears a GPS bracelet and is currently allowed to travel nationwide for his work as a long haul trucker and on a curfew set by Pre-trial Services. The Court has modified Mr. Ramirez' bail conditions numerous times, as he has demonstrated his ability to be fully compliant and abide by all his reporting requirements. As the Court is also aware Mr. Ramirez works as a truck driver and recently his trucking company has expanded its territory to areas requiring long hauls. The Court recently modified Mr. Ramirez' bail conditions allowing him to travel only for employment purposes outside his present restrictions and expand his travel area to nationwide as long as he gives Pre-Trial 48 hours notice. Pre-Trial has set Mr. Ramirez' curfew at 12:00AM with him allowing to leave again at 4:00AM. This is the smallest curfew Pre-Trial can do. This curfew has resulted in Mr. Ramirez either having to lose business or rush home to arrive home by 12:00AM. Both Mr. Ramirez and Pre-Trial realize the danger and lack of need for the curfew at this time. Thus, with the consent of the Government, Mr. Ramirez respectfully requests that the Court modify Mr. Ramirez' bail conditions by removing the curfew requirement, maintaining the GPS monitoring and continuing the 48 hour notice for when he will be leaving the state of Florida and adding to that notice when he will not be arriving home by 12:00AM.

Thank you very much for your


Most Respectfully,

  
David Touger, Esq.

Defendant's unopposed request to modify his bail conditions as stated herein is GRANTED.

**SO ORDERED.**

Dated: May 5, 2022  
New York, NY

  
Victor Marrero  
U.S.D.J.